

# Exhibit 13

## code of conduct and ethics

This Code of Conduct and Ethics (“Code”) serves as the centerpiece of our Ethics and Compliance program. It summarizes many of the key policies that apply across DeVry Group and establishes minimum standards of conduct, everywhere we operate. It is a starting point, and designed to help you:

- Identify the compliance and ethics risks that apply to our organization and your job.
- Understand the rules that we must follow every day.
- Know where to turn for help or guidance.



The application of each section of this Code may vary from institution to institution, and when an institution’s policy or local law is stricter than the standards set forth in this Code, you should follow your institution’s policy or local law.

## scope and application

This Code applies to our officers, directors, and full- and part-time colleagues and faculty. It applies across our family of educational institutions, everywhere we operate. Furthermore, we expect the third-party associates with which we partner to adhere to the standards set forth in this Code.

## structure of this code

This Code is organized into chapters. Each chapter (e.g., *you and our students*) contains a summary of important policies and minimum standards that apply across our enterprise, everywhere we operate. Certain topics, such as “gifts” and “entertainment,” are covered in more than one chapter. This is because the rules or standards related to a given compliance topic may vary depending on the context in which the compliance topic is raised. Be sure to familiarize yourself with the compliance and ethics standards that cut across many areas of our operations.